



NORTHERN  
SONOMA COUNTY  
AIR POLLUTION CONTROL DISTRICT

150 Matheson Street, Healdsburg, CA 95448 • PH: (707) 433-5911 • FX: (707) 433-4823

July 30, 2010

Mr. Jared Blumenfeld, Regional Administrator  
Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Regarding: Implementation of Greenhouse Gas Tailoring Rule for PSD and Title V

Dear Mr. Blumenfeld,

This letter is being submitted pursuant to the notification request in EPA's recently promulgated "Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule" (Tailoring Rule) under 75 FR 31514, Sections IV.C and V.C.5.

The Northern Sonoma County Air Pollution Control District (NSCAPCD, or District), currently implements a program for Prevention of Significant Deterioration (PSD) through District Regulation 1, Rule 220, New Source Review (including PSD), which has been approved into the State Implementation Plan (SIP). The District also implements an approved Part 70 permit program (Title V).

The District intends to continue to implement a SIP-approved PSD program, and an approved Title V program, for all subject sources and air pollutants, including sources which EPA defines as major sources of greenhouse gases (GHGs). In order to accomplish this, the District is developing a separate, general prohibitory rule that will (1) establish applicability thresholds for GHGs and require sources that meet those thresholds to comply with the District's PSD and /or Title V rule(s) as applicable, consistent with the Tailoring Rule; (2) allow sources to limit their potential to emit consistent with the procedures and principles developed with EPA for Title V sources of other regulated air pollutants; and (3) establish monitoring, recordkeeping, reporting, enforcement, and other administrative requirements.

District staff has already begun discussions with EPA Region IX staff on this approach, and will work collaboratively with EPA to bring it forward quickly. In developing this rule, the District has agreed to prepare a model rule that other districts may use as well if they choose to follow this approach.

The NSCAPCD staff intends propose the rule to the District's Governing Board before the end of 2010, and will request that EPA delegate any necessary authorities to implement the requirements of the Tailoring Rule until such time as the District's new rule is approved into the SIP.

If you have any questions in this matter, please feel free to contact me at (707) 433-5911.

Best Regards,



Barbara A. Lee  
Air Pollution Control Officer

Cc: Deborah Jordan, Director of Air and Toxics Division, EPA Region IX  
James Goldstene, Executive Officer, California Air Resources Board  
Mat Ehrhardt, President, California Air Pollution Control Officers Association  
Cory O'Donnell, District Counsel